

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

TYRONE B. HENDERSON, SR., et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:14-cv-00221-JAG
)	
FIRST ADVANTAGE BACKGROUND)	
SERVICES CORP.,)	
)	
Defendant.)	
)	
)	

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
CONSENT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Defendant First Advantage Background Services Corp. (“Defendant”), by counsel, hereby moves this Court for the entry of the Stipulated Protective Order, attached to the Consent Motion for Entry of Protective Order, and in support thereof states:

1. Plaintiffs’ complaint alleges claims under the Fair Credit Reporting Act against Defendant.
2. The parties desire to facilitate the production of information and documents by protecting against the unnecessary public disclosure of sensitive information, which may include trade secrets, proprietary systems, confidential commercial information, confidential applicant or employee information, confidential research and development, or other proprietary information belonging to Defendant and/or credit, personal, and other confidential information belonging to Defendant and/or other confidential information of Plaintiffs.
3. The parties have agreed to a Stipulated Protective Order (the “Order”) that, among other things, permits the designation of certain documents as “confidential” and limits the manner in which those documents may be revealed.

4. The Court has authority under Rule 26(c) to manage the disclosure of any such confidential materials in accordance with the terms agreed to by the parties.

5. Counsel for Plaintiffs has agreed to the entry of the Order. A copy of the proposed Order is attached to the Motion. A copy of the Order executed by counsel will be forwarded to the clerk's office.

6. Accordingly, Defendant moves this Court for entry of the Stipulated Protective Order governing discovery and protection of confidential information.

Date: January 14, 2015

Respectfully submitted,

FIRST ADVANTAGE BACKGROUND
SERVICES CORP.

By: /s/ Taron K. Murakami

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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2015, a true and correct copy of the foregoing Memorandum of Points and Authorities in Support of Consent Motion for Entry of Protective Order was filed by CM/ECF, with electronic notification to:

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